

# **EXHIBIT 131**

## **REDACTED**

**In the Matter Of:**

*In Re - Google Digital Advertising Antitrust Litigation*

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[REDACTED]

*September 06, 2024*

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 - - -

4 IN RE: GOOGLE DIGITAL : CIVIL ACTION  
5 ADVERTISING ANTITRUST : NO.  
6 LITIGATION : 21-MD-3010-  
7 : PKC  
8 :  
9

10 - HIGHLY CONFIDENTIAL -

11 - - -

12 September 6, 2024

13 - - -

14 Videotaped deposition of  
15 [REDACTED] taken pursuant to notice,  
16 was held at the law offices of  
17 Freshfields Bruckhaus Deringer, 3 World  
18 Trade Center, New York, New York,  
19 beginning at 9:35 a.m., on the above  
20 date, before Michelle L. Ridgway, a  
21 Registered Professional Reporter,  
22 Certified Shorthand Reporter, Certified  
23 Realtime Reporter, Certified Court  
24 Reporter, and Notary Public.  
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1 break?

2 MS. FORKNER: Sure.

3 THE VIDEOGRAPHER: The  
4 time is 11:40 a.m. We are going  
5 off the record.

6 (Short break.)

7 THE VIDEOGRAPHER: It is  
8 11:52 a.m. We are back on the  
9 record.

10 BY MR. KOROLOGOS:

11 Q. Hello again.

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 Q. What is a header bidding  
17 line item limit?

18 MS. FORKNER: Objection to  
19 form.

20 THE WITNESS: I think  
21 answering that requires sort of  
22 context as to what line items  
23 are.

24 Line items -- and header  
25 bidding line item limit is not

1 really a header bidding line

2 item limit, it's just a line

3 item limit.

4 BY MR. KOROLOGOS:

5 Q. Okay.

6 A. DoubleClick for Publishers,

7 and now GAM, allows publishers to manage

8 direct relationships with advertisers,

9 relationships with other SSPs, et

10 cetera, in fairly sophisticated ways,

11 where different deals or relationships

12 can be represented through line items.

13 And a line item has

14 targeting associated with it. So only

15 on my sports pages or whatever it --

16 whatever it happens to be.

17 And so these line items

18 represent business logic that are

19 targetable and actionable within

20 serving, in terms of how to express how

21 a publisher wants to manage ads on their

22 site.

23 By default, Ad Manager

24 allows publishers to create 65,000 line

25 items. And they can create as many or

1 as few as they want to meet their

2 business needs.

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

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9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 And there's a line item

20 type called price priority, which you

21 can set a value associated with that

22 particular line item so if it's

23 targeted, it's now eligible, and we look

24 at all of the line items that are

25 eligible to serve.

1 And from a price priority  
2 perspective, we take the highest price  
3 of all the line items that are targeted.

4 So line item limits have  
5 been around since the very beginning of  
6 Ad Manager. And we need limits.

7 And to be clear, these are  
8 active line item limits. You can create  
9 a million line items in our system. But  
10 only 65,000 can be active at a time,  
11 because we then take all of those line  
12 items and move them into serving in a  
13 low-latency cache, where I can target  
14 them and use the information and serving  
15 time.

16 The more line items we have  
17 to marshal into serving, the higher the  
18 resource costs. And we have to actually  
19 do budgeting ahead of time to make sure  
20 we've adequately provisioned all of our  
21 data centers to provision all of the  
22 complex targeting that would then be  
23 live, and it requires more when you have  
24 more line items.

25 So that's what a line item

1 limit is, to sort of make sure that  
2 we -- you know, a publisher doesn't  
3 arbitrarily make a set of changes that  
4 blow past our ability to serve ads for  
5 all of our publishers using our system.

6 Some publishers using  
7 header bidding decided that they want to  
8 have fairly complex setups with very  
9 fine granularity where they modeled out  
10 their system and they said, I need more  
11 than 65,000 line items.

12 So this -- what is a line  
13 item limit, a header bidding line item  
14 limit? It's a limit on the number of  
15 line items. It's not specific to header  
16 bidding. It's been around since the  
17 beginning of DFP. It predates me by a  
18 long shot. And it's a limit that's  
19 there to ensure that our systems scale  
20 effectively and one publisher doesn't  
21 bring down the whole system.

22 Q. And you mentioned that line  
23 item limits have been around as long as  
24 Ad Manager. But they predated Ad  
25 Manager as well, correct?



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[REDACTED]  
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[REDACTED]  
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[REDACTED]

I'd have to speculate.

BY MR. KOROLOGOS:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Q. What's a data transfer  
report file?

A. Ad Manager offers to Ad  
Manager 360 publishers an option for an  
additional service that -- in which we  
would provide what we call data transfer  
files that contain event-level data of  
all the ads served to their property.

Q. How many Ad Manager 360  
publishers are there approximately?

A. So I don't know the answer  
to that question off the top of my head.  
But it's a minority, not the majority.

1 [REDACTED] [REDACTED]

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1 say, "In January of 2024, Google made  
2 available to publishers using Google Ad  
3 Manager 360 a modified bid" -- "bids  
4 data transfer report file, a joinable  
5 bids data transfer report file, that  
6 could be joined with other data transfer  
7 report files containing bid information  
8 for requests originating outside of  
9 Europe."

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25	of.	

**HIGHLY CONFIDENTIAL****ERRATA SHEET FOR THE TRANSCRIPT OF:**Case Name: *In re Google Digital Advertising Antitrust Litigation*, 1:21-md-03010 (PKC)

Deposition Date: September 6, 2024

Deponent: [REDACTED]

**CORRECTIONS**

Page	Line	Change	Reason
11	22	[REDACTED]	Transcription Error
18	8	The phrase “ad to be” should read “ad be”	Transcription Error
29	24	The phrase “We” should read “We’d”	Transcription Error
56	16	[REDACTED]	Transcription Error
65	7	[REDACTED]	Transcription Error
72	25	[REDACTED]	Transcription Error
73	20	[REDACTED]	Transcription Error
81	3	[REDACTED]	Transcription Error
89	8	[REDACTED]	Transcription Error
91	12	[REDACTED]	Transcription Error
92	24	The phrase “and header” should read “and the header”	Transcription Error
104	23	The phrase “typically embedded” should read “typically embedded directly”	Transcription Error
111	2	The phrase “ala” should read “a la”	Transcription Error
111	12	The phrase “That wasn’t” should read “No, that wasn’t”	Transcription Error
118	14	The phrase “out of the database” should read “out of a database”	Transcription Error
127	24	[REDACTED]	Transcription Error
132	23	The phrase “So I don’t” should read “I don’t”	Transcription Error
134	16	[REDACTED]	Transcription Error
134	20	[REDACTED]	Transcription Error
138	24	[REDACTED]	Transcription Error
139	13	[REDACTED]	Transcription Error
145	14	[REDACTED]	Transcription Error
146	21	[REDACTED]	Transcription Error
150	23	[REDACTED]	Transcription Error

Page	Line	Change	Reason
163	20		Transcription Error
165	1	The phrase “ala” should read “a la”	Transcription Error
165	5	The phrase “ala” should read “a la”	Transcription Error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: October 4, 2024

Signature

A large black rectangular redaction box covering the signature area.